

EXHIBIT 12

Jacksonville, FL

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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IN RE: PHARMACEUTICAL) MDL NO. 1456
INDUSTRY AVERAGE WHOLESALE)
PRICE LITIGATION) CIVIL ACTION:
) 01-CV-12257-PBS
THIS DOCUMENT RELATES TO)
U.S. ex rel. Ven-A-Care of)
The Florida Keys, Inc. v. Abbott)
Laboratories, Inc., et al.)
No. 06-CV-11337-PBS)
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Videotaped Deposition of FIRST COAST SERVICE
OPTIONS, INC., by and through JEAN VEAL, taken on
behalf of Abbott Laboratories, Inc., on Tuesday,
March 25, 2008, at Smith, Gambrell & Russell, LLP,
50 North Laura Street, Suite 2600, Jacksonville,
Florida, before Karen F. Howard, Registered
Professional Reporter and Notary Public in and for
the State of Florida at Large.

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1 MR. LAVINE: Object to form.

2 BY MS. RAMSEY:

3 Q When you were preparing for your
4 deposition today, did you determine for which years
5 you found arrays for each J-Code?

6 A No, I mean -- could you repeat that?

7 MS. RAMSEY: Can you read it back?

8 (The last question was read by the
9 reporter as follows: "When you were preparing for
10 your deposition today, did you determine for which
11 years you found arrays for each J-Code?")

12 A I mean, we looked at some, but I don't
13 think we looked at each year.

14 Q Do you know when the earliest year is that
15 you found any J-Codes for -- or strike that.

16 Do you know for which year -- strike that
17 again.

18 What's the earliest year for which you
19 found an array for any of the subject J-Codes?

20 A I think the earliest was 1995.

21 Q I take it from 1991 through 1994 there
22 aren't any J-Codes -- I'm sorry, there aren't any

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1 arrays for these subject J-Codes?

2 A Well, I'm not saying there aren't any, but
3 they were possibly in storage. We didn't pull
4 everything out of storage.

5 Q You didn't locate any?

6 A Well, we didn't really look. I mean . . .

7 Q In your searches that were conducted so
8 far --

9 A Right.

10 Q -- none showed up?

11 A That's correct.

12 Q When I was reviewing the documents, I did
13 not locate any arrays for 1995. Do you recall
14 whether the 1995 array for which you referenced
15 earlier was related to one of Abbott's subject J-
16 Codes?

17 A I think they were -- what I was looking at
18 was -- it looked more like a spreadsheet, and they
19 would have some NDCs on them. They would have the
20 J-Code, NDCs on them. And, I mean, in a way they
21 weren't really arrayed. That was NDCs that Lorna
22 used to -- she was the one that did it before me --

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1 A No. I mean, I wasn't in charge of the
2 overall search. I mean, I think other departments
3 besides just me were required to search.

4 Q And when you were talking about documents
5 that were in storage, did you mean in storage right
6 at the offices of First Coast?

7 A No. I meant -- there's a storage
8 warehouse First Coast uses. I'm not sure where it
9 is.

10 Q And do you have an understanding as to the
11 scope of the search that was performed with respect
12 to those documents in storage?

13 MS. RAMSEY: Object to form.

14 A No. I mean, I don't think everything was
15 pulled out of storage. I think it was what was
16 right at hand.

17 Q Do you have an understanding as to why or
18 why not?

19 A Just because I think the documents said if
20 it was unduly burdensome, don't pull them or don't
21 search, something to that effect.

22 Q Are there a lot of boxes in storage?

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